

IN THE DRAWINGS

The Drawings are amended as follows:

Drawing Sheet 2 amended FIG. 2: added reference character 2 to identify "NETWORK"

Attachment: Replacement Drawing Sheet 2 including FIG. 2.

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-7, 9-45 and 47-72 are currently pending. Claims 8-14 and 46-57 are hereby canceled. Claims 1, 15, 22, 34, 58 and 70 are independent. Claims 1, 15-22, 34 and 58-70 are hereby amended. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed.

Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II. OBJECTIONS TO THE SPECIFICATION

The specification has been amended herein to correct the typographical error noted in the Office Action.

III. OBJECTIONS TO THE DRAWINGS

The drawings have been amended as discussed herein above to overcome the objection noted in the Office Action.

Applicant respectfully requests withdrawal of the objection to the drawings.

IV. REJECTIONS UNDER 35 U.S.C. §101

Claims 8, 15, 46 and 58 were rejected as allegedly directed to non-statutory subject matter. Claims 8 and 46 have been canceled herein, making the rejection of those claims moot. Claims 15 and 58 have been amended to overcome the §101 rejection.

Applicant respectfully requests withdrawal of the §101 rejection of claims 8, 15, 46 and 58.

V. REJECTIONS UNDER 35 U.S.C. §102

Claims 1, 3, 5, 7, 8, 10, 12, 14, 15, 17, 19, 21-24, 26-36, 38-48, 50-60 and 62-72 were rejected under 35 U.S.C. §102 as allegedly anticipated by U.S. Patent No. 7,154,534 to Seki et al. (hereinafter, merely "Seki").

Applicant respectfully traverses this rejection.

Independent claim 1 is representative and recites, *inter alia*:

"selecting a template from a plurality of templates, each template containing a setting of a scene arrangement of a plurality of scenes of content;

...

wherein the template is a scene arrangement sequence for the plurality of scenes set in advance for a story structure of the video content."

As understood by the Applicant, Seki discloses, in relevant part, operating instructions for a digital camera to capture a particular image. An image title is selected from a list of image titles in an image capture guide list. "[I]nstruction information (instructions for how to shoot and

for post-shooting processing), corresponding to the selected image title is displayed, and the user takes its picture based on the displayed shooting method and performs the processing according to the displayed instruction for post-shooting processing.” Col. 29, lines 6-19.

In contrast, claim 1 recites, “selecting a template . . . wherein the template is a scene arrangement sequence for the plurality of scenes set in advance for a story structure of the video content.” That is, in this aspect of the invention, the template is a sequence of scenes determined in advance to create a certain video project. An example of the scene sequence is provided in the specification in the case of a template for content for advertising and introducing a station shopping area. The arrangement of scenes #1 to #n of the template is described in the specification. Publ. App. par. [0130]-[0136].

In this aspect, the content project data is created using the template in which the scene arrangement has been set in advance. Playing the content project data enables the operator to preview the rendition of the completed content. The operator may preview the rendition of the content multiple times while drawing the content project and may refine the details of each scene. Publ. App. par. [0073].

A template is a data file in which, for example, the more or less conventional scene arrangement of video content, timeline for each scene, and the like are set. For example, scenes from the opening title scene through the ending scene are set to serve as a guide in accordance with the story structure of the content. Publ. App. par. [0120].

A feature of the aspect of the invention is enabling a non-expert video shooter to produce content of high quality because the content project data can be created easily and the video shooter can check the outline of the project and the shooting result by playing the content project

data and the video image data in the sequence of the content at an arbitrary time. Publ. App. par. [0351].

The Office Action points to Seki col. 29, lines 40-51 and col. 31, lines 17-33 for the above features recited in claim 1. However, those locations reinforce the disclosure of Seki as teaching “[s]hooting instruction which is provided before shooting as shooting instruction information.” (internal quotations removed) Col. 29, lines 43-46. And further, the Seki system “shows the drawing for guidance of how to shoot such as shooting points. In accordance with this drawing, the user can select subjects according to the instruction for how to shoot (shooting points) shown in this drawing, and take pictures of these.” (emphases added) Col. 31, lines 20-24.

The Seki system providing instructions for using a digital camera to take a particular shot is clear throughout Seki and, for example, at col. 31, lines 33-47:

“... the image titles in the image capture guide list are displayed. An image title is selected from the displayed image titles, and the shooting instruction information for the selected image title (instructions for how to shoot and for post-shooting processing) is displayed. The user takes pictures based on the displayed method for shooting and performs the processing based on the instruction for the displayed post-shooting processing. Accordingly, the user can perform shooting and its post-shooting processing based on the displayed shooting instruction information. Therefore, shooting and post-shooting processing can be performed based on the instruction by the creator, who has created the image capture guide list, or an instructor.”

In the aspect of the present invention, the above described template, as defined in the specification, includes the sequence of scenes (and may also include characteristics of the individual scenes as an outline for a video project). This is distinguishable from Seki wherein

operating instructions for pre-processing and post-processing using a digital camera are provided to capture a particular image.

For reasons similar or somewhat similar to those described above with regard to independent claim 1, independent claims 15, 22, 34, 58 and 70 are also believed to be patentable.

VI. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 2, 4, 6, 9, 11, 13, 16, 18, 20, 25, 37, 49 and 61 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Seki in view of U.S. Patent No. 7,020,381 to Kato et al. (hereinafter, merely "Kato").

Kato does not add the feature missing from Seki as discussed above. Claims 2, 4, 6, 9, 11, 13, 16, 18, 20, 25, 37, 49 and 61 depend from one of the claims discussed above and are believed patentable for at least the same reasons.

VII. DEPENDENT CLAIMS

The other claims are dependent from one of the claims discussed above and are therefore believed patentable for at least the same reasons. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

Claims 1-7, 9-45 and 47-72 are in condition for allowance. In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited

reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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